

UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

SCANNED at ISP and Emailed on
7/24/19 by [signature] - 35 pages
(date) (initials)

THOMAS R. GANUS)

Plaintiff,)

v.)

KIMBERLY CREASY, et al.,)

Defendants.)

Cause No. 3:18-cv-928-RLM-JEM

PLAINTIFF'S PROPOSED SCHEDULING STATUS REPORT

COMES NOW the Petitioner, Thomas R. Ganus, *pro se*, pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Northern District of Indiana Local Rule 16- 1(c), and submits his *Proposed Scheduling Status Report*. In support of the Plaintiff's proposed scheduling status report, the Plaintiff states as follows:

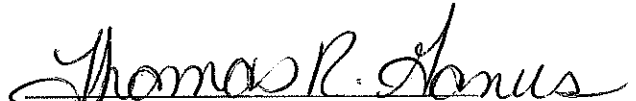
1. That on July 8, 2019, the Court issued its Order to scheduling in this case. (Docket).
2. That the Plaintiff has up to, and including, August 6, 2019 in which to submit his Status Report. (Docket).
3. That the Plaintiff requests an additional sixty (60) days set for joining parties and amending the pleadings after the date of August 6, 2019, should no additional information during discovery be introduced causing the Plaintiff to file additional amendments and/or pleadings.
4. That the Plaintiff requests one-hundred and eighty (180) days to complete discovery for the following reasons:
 - a) Plaintiff has very limited access to resources to research and prepare his legal documents due to scarce and very outdated legal material in the prison's law library;

- b) Plaintiff is very restricted in the times that he is scheduled to attend the prison's law library due to being very small with only three (3) computers to access with an offender population of approximately four hundred (400) offenders;
- c) Plaintiff must contend with unavoidable prison lock downs;
- d) Plaintiff must contact the warden in order to gain permission to supply recording device and schedule the Plaintiff to depose the Defendants at the maximum security prison;
- e) Plaintiff is required by the Indiana Department of Correction and the Indiana Department of Labor to attend his job position as an offender instructor in the Garden/Management Apprenticeship Program with at least a seventy (70%) percent attendance rate or be terminated further restricting his time to attend the prison law library; and
- f) Plaintiff is unable to directly contact the opposing parties as the Plaintiff is incarcerated and must rely on communications through the United States mail.

4. That the Plaintiff requests thirty (30) days to file his disposition motion after the completion of discovery.

WHEREFORE, The Plaintiff, respectfully submits his *Proposed Scheduling Status Report* to this Court for Consideration.

July 23, 2019


Thomas R. Ganus
Plaintiff/Pro se

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I, Thomas R. Ganus, do hereby certify that on this 23rd day of July 2019, I submitted a true and correct copy of *Plaintiff's Proposed Scheduling Status Report* to the law library supervisor at the Indiana State Prison minimum security unit to electronically file with the Clerk of the Court of the United States District Court, Northern District of Indiana, South Bend Division, Robert A. Grant Federal Building & US Courthouse, 204 South Main Street, Room 102, South Bend, Indiana 46601.

In addition, I, Thomas R. Ganus, do hereby certify that on this 23rd day of July 2019, I mailed a true and correct copy of *Plaintiff's Proposed Scheduling Status Report* upon:

Deputy Attorney General
Kelly D. Cochran
Indiana Attorney General's Office
Indiana Government Center-South
Fifth Floor
302 West Washington Street
Indianapolis, IN 46204

by submitting same to a designated civilian employee of the Indiana Department of Corrections for prompt processing and placement in the U.S. Mail by authorized prison personnel within the facility mailroom, with sufficient first-class postage prepaid, and it shall be deemed **FILED** as of the date under *Houston v. Lack*, 487 U.S. 266, 108 S. Ct. 2379, 101 L. Ed.2d 245 (1988).

Respectfully submitted,



Thomas R. Ganus
Plaintiff/Pro se
DOC #111462
Indiana State Prison/Outside
201 Woodlawn Avenue
Michigan City, IN 46360